

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION**

**SCOTT TURNAGE , CORTEZ D.  
BROWN, DEONTAE TATE, JEREMY S.  
MELTON, ISSACCA POWELL, KEITH  
BURGESS, TRAVIS BOYD, TERRENCE  
DRAIN, and KIMBERLY ALLEN on  
behalf of themselves and all similarly  
situated persons,**

**Plaintiffs,**

**v.**

**BILL OLDHAM, in his individual capacity and in  
his official capacity as the Sheriff of Shelby County,  
Tennessee; ROBERT MOORE, in his individual  
capacity and in his official capacity as the Jail  
Director of Shelby County, Tennessee;  
CHARLENE MCGHEE, in her individual capacity  
and in her official capacity as the Assistant Chief of  
Jail Security of Shelby County, Tennessee; DEBRA  
HAMMONS, in her individual capacity and in her  
official capacity as the Assistant Chief of Jail  
Programs of Shelby County, Tennessee; SHELBY  
COUNTY, TENNESSEE, a Tennessee  
municipality; and TYLER TECHNOLOGIES,  
INC., a foreign corporation; GLOBAL TEL\*LINK  
CORPORATION, a foreign corporation;  
SOFTWARE AG USA, INC., a foreign corporation;  
SIERRA-CEDAR INC., a foreign corporation;  
SIERRA SYSTEMS GROUP, INC., a foreign  
corporation, and TETRUS CORP, a foreign  
corporation,**

**Defendants.**

**Civil Action No. 2:16-cv-02907-SHM-  
tmp**

**(Hon. Judge Samuel H. Mays)**

**SHELBY COUNTY DEFENDANTS' MOTION  
FOR PERMISSION TO EXCEED PAGE LIMIT**

Pursuant to Local Rule 7.2(e) Defendants Bill Oldham, Robert Moore, Charlene McGhee,  
Debra Hammons, Floyd Bonner, Kirk Fields, Reginald Hubbard, Tiffany Ward and Shelby County,

Tennessee (collectively, “Shelby County Defendants”) respectfully move the Court for permission to exceed the Local Rule page limits applicable to their response in opposition to Plaintiffs’ Motion and Memorandum for Discovery Conference, to Permit Merits-Based Discovery, to Compel Depositions, and for Sanctions and Fees (“Plaintiffs’ Motion” or “Motion”) (ECF No. 291). As grounds for this motion, Shelby County Defendants state that a longer, more detailed response than is typically necessary will be required to thoroughly apprise the Court of the facts and information that should properly be considered in weighing Plaintiffs’ Motion. The additional pages sought by Shelby County Defendants are necessary to ensure that such issues are fully briefed before the Court.

More specifically, the issues raised in Plaintiffs’ Motion require the Court to consider a detailed history of the parties’ conversations and discovery efforts over the course of more than nine months and to consider the parties’ respective positions concerning the drastic sanctions that the Plaintiffs seek to have imposed on the Shelby County Defendants. As this Court is undoubtedly aware after having taken an active role in overseeing the parties’ discovery efforts, this discovery history—and this matter generally—is extremely complex. Plaintiffs’ Motion selectively samples from this history, leaving out key details that explain the parties’ respective positions regarding the timing and scope of depositions and that are critical for the Court to consider. Even while only telling half the story, Plaintiffs’ memorandum reached the 20-page maximum permitted by L.R. 7.2(e). Moreover, Plaintiffs have utilized briefing on a separate motion for an amended scheduling order to devote still more pages to arguing issues concerning the bifurcation of discovery raised in their Motion. *See* Plaintiffs’ Response in Partial Opposition to Defendants’ Motion Requesting Approval of Proposed Third Amended Scheduling Order (13 pages in length) (ECF No. 293).

Simply put, the Shelby County Defendants cannot adequately brief the issues before the Court within the 20-page limit imposed by L.R. 7.2(e). Plaintiffs’ requests that depositions be compelled and various sanctions be leveled against Shelby County Defendants require the Court to undertake a fact-

intensive analysis, and Shelby County Defendants respectfully submit that additional pages are necessary to refute Plaintiffs' positions. For these reasons, Shelby County Defendants respectfully request the Court grant this motion in the interests of justice and fairness and permit its response to Plaintiffs' Motion to exceed the standard page limit of L.R. 7.2(e)..

Respectfully submitted,

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**CERTIFICATE OF CONSULTATION**

On April 7, 2020, Odell Horton, co-counsel for Shelby County Defendants, conferred with Mike McLaren, co-counsel for Plaintiffs, via telephone regarding this Motion for Permission to Exceed Page Limit. Mr. McLaren asked Mr. Horton how many additional pages Shelby County Defendants intended to submit, and Mr. Horton responded that he would get back to Mr. McLaren the following day. Mr. Horton made several calls to Mr. McLaren on April 8 and 9, 2020, but was unable to reach him by the time of this Motion's filing.

/s/ Meghan M. Cox

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 9, 2020, a true and correct copy of the foregoing was served upon the following counsel via the Court's ECF filing system:

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